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United States Department of the Interior

BUREAU OF RECLAMATION
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IN REPLY
REFER TO:

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MAR 10 1995

John Caffrey
Chairman
State Water Resources Control Board
901 P Street
Sacramento CA 95814-6415

Subject: Draft Water Quality Control Plan for the San Francisco
Bay/Sacramento-San Joaquin Delta Estuary and Environmental Report

Dear Mr. Caffrey:

In consultation with the Federal Ecosystem Directorate (Club FED), Reclamation has worked with staff of the various agencies and interested parties to refine and clarify the standards contained in the December 15, 1994, Principles for Agreement (Principles) and in the subject draft Water Quality Control Plan (draft Plan). Below we have briefly summarized the resolution of the unresolved issues identified in our February 23, 1995, testimony before the State Water Resources Control Board (SWRCB). Reclamation has two specific comments on the draft Plan and Environmental Report that are not addressed in the summaries.

Summary Comments

In our comments at the February 23, 1995, hearing, we mentioned five issues that had not been resolved at that time. We believe those issues have been resolved and are listed below:

1. San Joaquin River Salinity. The San Joaquin water quality standard for fish spawning shall be 0.44 EC from Prisoners Point to Jersey Point in wet, above normal, below normal and dry years, and no standard shall apply in critically dry years.
2. Forecast for San Joaquin Flows. Project operations shall use the 90 percentile forecast to determine required San Joaquin River flows. This will be included in the Biological Opinions.
3. Delta Outflow. The specific language for the X2 starting gate includes the following items:
 - a. When the January 8-River Index (8RI) is 650 KAF or less, compliance may be met one of three ways - daily or 14-day EC of 2.64 mS/cm at Collinsville or Net Delta Outflow Index of 7100 cfs for February 1-14.
 - b. If the previous months 8RI is between 650 and 800 KAF, then the CALFED Ops Group has discretion to allow 3-way compliance as above.
 - c. If the previous months 8RI is greater than 800 KAF, then the requirement can only be met with the daily or 14-day EC.
4. Export Limits During San Joaquin River Pulse Flows. The following description of operations during the pulse flow has been included in the March 27, 1995, Biological Opinion for delta smelt:

"The operating criteria listed above specifies that during the April and May 30-day pulse flow period, combined Central Valley Project (CVP)/State Water Project (SWP) exports may be the greater of 1,500 cfs or 100 percent of Vernalis flow. Reclamation will pursue acquisition of additional flow (acquired flow) to provide San Joaquin flows at Vernalis during the April and May 30-day pulse in excess of those exported by CVP and SWP. Any such additional flows will be identified as being in excess of those attributable to CVP releases, unregulated accretions or unstoreable flows. Through the CALFED process and other associated discussions, Reclamation and Department of Water Resources (DWR) will encourage measures that will minimize the diversion of additional flow provided (i.e. acquired flow) during the pulse flows. An Operations Plan shall be submitted to the Fish and Wildlife Service (Service) by April 1 of each year describing Reclamation and DWR's Delta operations and forecasted San Joaquin River flows during the April and May 30-day pulse flow. The objective of this Operations Plan is to provide a flow at Vernalis that exceeds CVP plus SWP export by an amount equal to 50 percent of the identified pulse flow associated with the most recently available forecasted San Joaquin 60/20/20 Index (at 90 percent probability of exceedance). In an effort to accomplish this goal, Reclamation and DWR will also consider operational flexibility within the Principles for Agreement or other means to provide Vernalis flows or Delta exports consistent with this objective."

5. Suisun Marsh Standards. Reclamation, the DWR, the Department of Fish and Game, and the Suisun Resource Conservation District have jointly discussed the draft Plan and the Principles and have developed recommendations for changes to the Suisun Marsh standards in the draft Plan. These recommendations will be included in the comments the DWR submits to the SWRCB.

Specific Comments

1. Delta Cross Channel Operation Requirements. We are concerned with the modification to Footnote 24 for Table 3. This footnote now differs from the criteria as expressed in the Principles. In the Principles, under the heading Additional Modifications to CUWA/AG Proposal, the criterion states, "During the period May 21 through June 15, the Delta Cross Channel may be rotated closed four days and open three days, including the weekend." The footnote to Table 3 of the draft Plan was originally consistent with that language, but has since been modified to say, "For the May 21-June 15 period, close the Delta Cross Channel gates for four consecutive days each week, excluding weekends."

The wording in the Principles was intended to allow Reclamation to retain discretion in the operation of the Cross Channel because a fixed, mandated cycle of operation may adversely affect objectives for salinity control. Furthermore, we are concerned that closure of the gates at that time of year may under some conditions affect the distribution of delta smelt. As such, we strongly support retaining discretion in determining gate operations and recommend the following text be added to Footnote 24 of Table 3: "This requirement may be modified by the CALFED Ops Group."

2. Impact Studies. Chapter VII of the Draft Environmental Report discusses the Water Supply Impacts of Preferred Alternative. The chapter reports results from DWRSIM studies based on specific modelling assumptions and operational assumptions for the CVP-SWP system. Club FED has some concerns about the modelling assumptions used in the Preferred Alternative and the CVP-SWP operational framework used to portray the strategy to meet the Preferred Alternative. The effort to model the Preferred Alternative and the operational strategy of the CVP-SWP system is an ongoing process and that models and assumptions are being constantly refined. Therefore, the numerical results from the studies analyzed and reported by SWRCB staff in the

Environmental Report on the basis of three modelled components - total export reductions, Sacramento River Basin storage changes, and San Joaquin River Basin water supply impacts - should not be considered as definitive and are subject to change as knowledge and assumptions change.

The areas of particular concern in the modelling studies are:

- a. Export operations during the San Joaquin pulse flow months of April and May.
- b. Upstream operations of CVP facilities and how they interact with the Preferred Alternative criteria in the Delta and upstream objectives such as instream flow issues, and especially temperature control objectives in the upper Sacramento River.
- c. Use of New Melones Reservoir as a surrogate measure for the San Joaquin River system and the operational implications to this CVP facility.

Thank you for the opportunity to comment on the draft Plan and Environmental Report.

Sincerely,

ACTING FOR

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Reclamation recommends that footnote 27 be modified (this was previously footnote 24). The intent of the original language in the Principles was to allow that Reclamation retain discretion in the operation of the Cross Channel Gates. We also suggested that if the State Board did not want to grant this exercise of discretion solely upon Reclamation, that it be conditioned by granting the CAL-FED Operations Group the ability to modify this requirement. The footnote as now contained in the draft WQCP will require gate closures for a specified number of days, though the timing of the closures may be modified by the operations group. We would request that either the State Board retain footnote 27 as originally drafted with the requested additional text ("This requirement may be modified by the CAL-FED Operations Group."), or that this be resolved with an additional footnote similar to footnote 22. We suggest the following:

"Variations in the number of days of gate closure are authorized if agreed to by the operations group established under the framework agreement. Variations shall result from recommendations from agencies for the protection of fish resources, including actions taken pursuant to the State and federal Endangered Species Act. The process for the approval of variations shall be similar to that described in Footnote 22."